REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Claims

    Claims 1 and 10 have been amended to positively recite that the overwritable member is part of the component (claim 1) or security processor (claim 10), and not an external device. As a result, the claims now positively recite that the method of claim 1 and processor of claim 10 response to *external* **threats** by recording status data of the sensors cyclically in an *internal* **overwritable memory**.

2. Rejection of Claims 1-18 Under 35 USC §103(a) in view of U.S. Patent No. 6,308,272 (Pearce) and UK Patent Publication No. GB 2 227 107 (Sloan)

    This rejection is respectfully traversed on the grounds that:

    a. neither the Pearce patent nor the Sloan publication discloses or suggests the claimed thresholding of sensor data (whether from one or multiple sensors) in combination with **cyclical storage** of **sensor data** in an **internal over-writable (volatile) memory** (the sensor data being transferred to a permanent memory upon detection of an attack, as described in the penultimate paragraph on the second to last page of the original specification)**, as opposed to a memory of a monitoring station at the other end of a transmission network from the component or security processor**;

    b. since neither Pearce nor Sloan suggests the claimed cyclical storage in an over-writable memory, neither could possibly suggest subsequent storage of the sensor data, when an attack occurs, in a non-volatile memory, as recited in claims 3 and 12; and

    c. neither the Pearce patent nor the Sloan publication discloses or suggests erasing data from a security memory based on attacks on a component containing both the security memory and sensors for detecting the attacks (Pearce is directed to

sensing attacks on an external entity, while Sloan is directed to sensing biometric data—it is true that Sloan at least erases data, but <u>not</u> on the basis of thresholding of sensors indicating an attack on the component).

With respect to local storage of data in an over-writable memory, while it might make sense to send intrusion data to a <u>central</u> monitoring station in the surveillance environment of Pearce, there is no reason for the claimed cyclical storage of data in a memory *that is part of the component or security processor to be protected*, since there is <u>no</u> concern with attacks on the monitoring equipment. To the contrary, since neither the Pearce patent nor the Sloan publication is concerned with the detection of external threats to a protected data storage, neither reference could have suggested the presently claimed **cyclical updating** of sensor data in an <u>internal</u> volatile or over-writable memory, which is necessary to ensure that the latest sensor data is stored before an attack occurs. The Pearce patent does disclose data logging, but only of threats to an external entity, which does not require the claimed cyclical storage of sensor data in a **local over-writable memory**. Instead, since the monitoring device of Pearce is not itself under threat, there does not appear to be any *need* for such cyclic recording of sensor data. The Sloan patent, on the other hand, does not disclose or suggest any sort of permanent monitoring or recording of sensor status data, and therefore the Sloan patent could not possibly have suggested modification of the system of Pearce to include the claimed cyclic sensor data storage

With respect to data erasure, as pointed out in the previous response, the Pearce patent is not concerned with detecting direct physical impact of an event on a data storage, but rather is concerned solely with the entrance of a person into a secured area, and therefore there is no possible need in the system of Pearce for erasure of data upon the occurrence of an event. Furthermore, while the Sloan publication does teach erasure of data, it only does so if a life function is below a threshold level for a preset time (or if successful biometric comparisons are not regularly performed), and again there is no need for erasure of data *upon sensing an attack based on the dual thresholds*. Thus, neither the Sloan publication nor the Pearce patent addresses

the same problem as the present invention, and neither comes up with the claimed solution of erasing data upon sensing and overshoot *or* undershoot of sensor data, <u>and</u> cyclic recording of the sensor data.

Because the Pearce patent and the Sloan publication do not disclose all elements recited in claims 1, 3-10, and 12-16, withdrawal of the rejection under 35 USC §103(a) is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, withdrawal of the rejections and expedited passage of the application to issue is requested.

Respectfully submitted,

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